IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEBRASKA

UNITED STATES OF AMERICA,) 4:24CR-3021
Plaintiff,)
VS.) MOTION TO EXTEND DEADLINE FOR SUBMISSION
VYACHESLAV ANDREEV,) OF SENTENCING MATERIALS
a.k.a. VYACHESLAV PENCHUKOV,	Ó
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Defendant.	

COMES NOW the Defendant, Vyacheslav Andreev, by and through his attorney of record, Stuart J. Dornan, and hereby requests that the date to submit sentencing materials in this matter currently set for May 30, 2024 be extended until June 13, 2024 for the following reasons:

- 1. According to Paragraph 6 of the Order on Sentencing Schedule, sentencing materials are due May 30, 2024.
- 2. Defense Counsel needs additional time to prepare and discuss referenced sentencing materials with his client.
- 3. John Higgins has no objection to an extension of the deadline to submit sentencing materials so long as any extension also applies to the Government.
- 4. Defendant has been advised of the continuance request and has no objection.

WHEREFORE, counsel prays that the deadline for submission of sentencing materials scheduled for May 30, 2024, be extended to June 13, 2024, and for such other and further relief the Court deems just and equitable.

VYACHESLAV ANDREEV, Defendant,

By: <u>s/Stuart J. Dornan</u>

STUART J. DORNAN, #18553

Attorney for Defendant

Dornan, Troia, Howard, Breitkreutz

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CERTIFICATE OF SERVICE

I hereby certify that on May 29, 2024, I electronically filed the foregoing document with the Clerk of the District Court using the CM/ECF system which sent notification of such filing to the following:

John Higgins, Assistant United States Attorney William A. Hall, Jr., Department of Justice

and I hereby certify that I have served the document by email to the following non CM/ECF participants:

N/A

s/Stuart J. Dornan STUART J. DORNAN, #18553

Attorney for Defendant